

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

**RILEY AMORE; and CAROLINE
PARKER,**

*individually and on behalf of all others
similarly situated,*

Plaintiffs,

v.

**AMERICAN ASSOCIATION OF
VETERINARY CLINICIANS; SOLUTION
INNOVATIONS, INC.; VCA ANIMAL
HOSPITALS, INC.; BLUEPEARL
HOLDINGS, LLC; MEDVET
ASSOCIATES, LLC; RED BANK
VETERINARY HOSPITAL, P.C.;
UNIVERSITY OF PENNSYLVANIA
SCHOOL OF VETERINARY MEDICINE;
CUMMINGS SCHOOL OF VETERINARY
MEDICINE AT TUFTS UNIVERSITY;
COLLEGE OF VETERINARY MEDICINE
AT MIDWESTERN UNIVERSITY;
NATIONAL VETERINARY ASSOCIATES,
INC.; PIEPER-OLSON VETERINARY
PARENT, LLC; PATHWAY VET
ALLIANCE, LLC; THE ANIMAL
MEDICAL CENTER, INC.,**

Defendants.

Case No. 7:25-cv-00229-EKD-CKM

MOTION FOR PRO HAC VICE ADMISSION OF MATTHEW J. PEREZ

Petitioner Roman Lifson, Esq., an attorney admitted to practice in this Court and counsel of record in the instant proceeding, pursuant to Local General Rule 6(d), hereby moves for the *pro hac vice* admission of Matthew J. Perez, Esq., to appear, associate, and participate as co-counsel

on behalf of Plaintiffs Riley Amore and Caroline Parker, individually and on behalf of all others similarly situated, in the above-styled case only, and to receive and make electronic filings in this case, and in support thereof state as follows:

1. Mr. Matthew J. Perez is a Partner at the law firm:

SCOTT+SCOTT ATTORNEYS AT LAW
The Helmsley Building
230 Park Avenue, 24th Floor
New York, NY 10169
(212) 233-6444

2. Mr. Matthew J. Perez is neither qualified nor licensed to practice in the Commonwealth of Virginia.

3. Mr. Matthew J. Perez is admitted to and a member in good standing of the bar of the State of New York, No. 4937728, and is qualified and licensed to practice before the United States District Court for the Southern District of New York, No. MP-3142.

4. Mr. Matthew J. Perez will promptly qualify for electronic case filing as required by Local Rule 6(d).

5. The Declaration of Mr. Matthew J. Perez in support hereof is attached hereto and incorporated herein by reference.

6. A draft Order is also attached hereto and incorporated herein by reference.

WHEREFORE, I, Roman Lifson, Esq., respectfully move this Court to enter an Order permitting Mr. Matthew J. Perez to appear *pro hac vice*, and participate as co-counsel on behalf of Plaintiffs Riley Amore and Caroline Parker, individually and on behalf of all others similarly situated, for all purposes relating to the proceedings in the above-styled case and directing the Clerk to provide notice of electronic filings to Matthew J. Perez at matt.perez@scott-scott.com.

Dated: April 18, 2025.

Respectfully submitted,

/s/ Roman Lifson

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* Pro Hac Vice Application Forthcoming

Counsel for Plaintiffs and the Proposed Class